

December 28, 2012

U.S. Environmental Protection Agency
ENSV/EFCB - Region VII
300 Minnesota Ave.
Kansas City, KS 66101-2907

RE: NPDES Inspection, Kansas City Winner PNP (formerly U-Pick-It), 12/19/2012, Permit # MOR90A37

Mr. Ahmad,

Once again, I would like to take this opportunity to point out that on the day of your inspection, Pick-n-Pull had just taken possession that morning of the Winner Road location, and was in the process of conducting day one Environmental, Health, and Safety training. No production activities had commenced under Pick-n-Pull ownership the day of your visit, nor has any taken place to date. Currently Pick-n-Pull is conducting cleaning and organizational activities at the location, to ensure environmental compliance and the ongoing safety of its employees.

Please find below Pick-n-Pulls responses for each of the concerns/opportunities noted during your visit on Wednesday, December 19, 2012.

Potential NPDES Permit Violations:

C1. The Facility failed to conduct employee training as required by 'Condition 2' of the NPDES Permit.

Condition 2

All involved personnel shall be provided training by the owner in material handling and storage, and housekeeping of dismantling, repair, rebuilding or storage areas. Proof of training shall be submitted on request.

C1 - Response:

Upon your arrival at the Winner Road location on Wednesday, December 19, 2012, Pick-n-Pull had just concluded Day 1 Environmental, Health and Safety training for all personnel at the Winner Road location. Training consisted of Computer Based Training (CBTs), and Power Point presentations. These environmental informational alerts are reviewed throughout the year during pre-workday tailgate talks.

Topics covered included:

- Environmental Compliance Orientation PowerPoint < document very large, burnt to CD, mailed to your attention >
 - General Introduction to Environmental Compliance
- PNP Process and Environmental BMP Presentation < document attached >
 - This is the onboarding Environmental presentation for new employees
- Storm Water BMPs: Spill Clean-Ups < document attached >
 - Outlines expectations for cleaning up spills on impervious surfaces, and the steps taken in the cleaning process
- Storm Water BMPs: Oil Spot Removal < document attached >
 - Outlines expectations for the removal of stained soils and spills out in the yard (pervious surfaces)



- Spill Prevention Control & Countermeasures < document attached >
 - Outlines expectations in regards to SPCC requirements
- Pre Rain Event – Storm Water BMP Prep < document attached >
 - Outlines expectations during rain events (inspections, etc.), and the expectation that oily parts are properly protected from coming into contact with storm water (covering, removal, and storage under cover)
- Post Rain Event - Managing Storm Water BMPs < document attached >
 - Outlines post rain event inspections of BMPs, to ensure that they are still in operable condition for the next event.
- Storm Water BMPs: Carpets & Trunk Mats < document attached >
 - Outlines a program which Pick-n-Pull established for placing car mats or recycled carpet mats under the engine compartment of vehicles in the customer yard, in an attempt to eliminate/reduce petroleum product leaks due to customer parts removal
- Storm Water BMPs: Burnt Vehicles < document attached >
 - Outlines expectations that vehicles damaged by fire, be covered and protected from contact with storm water.
- Storm Water BMPs: How to properly protect a drain inlet (DI) < document attached >
 - Outlines expectations regarding the proper techniques for properly protecting drain inlets
- Groundskeeping Procedures < document very large, burnt to CD, mailed to your attention >
 - This procedure outlines Pick-n-Pulls housekeeping activities developed to eliminate/minimize Stormwater impact from our processing and customer yard activities.

C2. The Facility failed to clean all spills as required by NPDES permit ‘Condition 7’

Condition 7

All spills must be cleaned up within 24 hours. This may include the excavation and disposal of contaminated soils.

C2 - Response:

Potential Future Spills:

It is Pick-n-Pulls practice to diligently remove easily accessible spills immediately upon discovery, and remove inaccessible spills when resetting rows in the yard. Please review the attached Environmental Alerts and ‘Groundskeeping Procedure’ for a more in-depth explanation of the environmental expectations surrounding spills on impervious/pervious surfaces.

Historic Spills and Soil Stainage:

Following Pick-n-Pull’s ‘Groundskeeping Procedure’, the production team has already begun housekeeping procedures. Initial emphasis is being focused on getting scrap, trash, general debris, and vehicle parts cleared from the exterior grounds, and then to begin the removal of visually impacted soils. The remainder of stained soils, those residing under set cars, will be addressed as rows are pulled and re-set.

C3. The Facility failed to report spills as required by NPDES permit ‘Condition 7.b.’

Condition 7(b)

The following spills must be reported to the department within 24 hours:

- (a) *Any spill of fluids or chemicals that leaves the property of the facility;*
- (b) *Any spill of fluids or chemicals outside of a secondary containment structure and greater than 25 gallons, whether or not it leaves the property.*

C3 - Response:

Pick-n-Pull is unable to speak to activities that ‘were’ or ‘were not’ conducted prior to our taking ownership of the property. Pick-n-Pull employees are instructed to notify our internal ‘Hot Line’ for any spills greater than 5 gallons outside of secondary containment.



Once a report of 25 gallons or greater have been reported through the 'Hot Line', agency/department notification would then take place, well within 24 hours.

C4. The Facility failed to comply with NPDES 'Condition 11'.

Condition 11

If a mechanical unit (engine, transmission, steering gear, transfer case, etc.), or system (brake, cooling, drive train) remains closed, and are to remain intact and there is no likelihood of leakage or spillage, the fluid need not be drained.

C4 - Response:

Pick-n-Pull is unable to speak to activities that 'were' or 'were not' conducted prior to our taking ownership of the property.

It is Pick-n-Pulls practice during the degarbagging/fluid removal process, that we remove to the best of our abilities the following materials/items from the vehicles: radiator fluid, Freon, mercury switches, brake reservoir fluid, windshield washer fluid, vehicle oils, gasoline/diesel, batteries, oil filters, tires, etc., prior to setting the vehicles in the yards for customer access.

In addition it is an expectation that the yards are swept daily to ensure that vehicle hoods are closed, to limit the potential for Stormwater impact with oily engines and parts.

C5. The Facility failed to comply with NPDES 'Condition 15'.

Condition 15

All outfalls must be clearly marked in the field.

C5 - Response:

C6. Batteries and Tires were improperly stored and were exposed to wet weather elements.

C6 - Response:

Pick-n-Pull is unable to speak to activities that 'were' or 'were not' conducted prior to our taking ownership of the property, but rather only towards activities which will be conducted to ensure there are no re-occurrences.

Batteries

Current Condition

Existing batteries in the yard are currently in the process of being identified and removed, as well as any batteries that might be in cars staged outside. We expect all batteries to be removed from the yard and properly staged indoors by January 04, 2013.

Future Condition

Following Pick-n-Pulls degarbagging program, batteries will no longer reach the customer yard, thus no longer be in a condition to be exposed to the wet weather elements. Batteries removed during the degarbage process, will be properly managed and stored within the covered structure until transported for disposal/re-manufacturing.

Tires

Current Condition

During your initial visit on December 19th, several tires were noted in the front parkinglot, throughout the customer yards, and a rather large accumulation within the structure on the southeast wall.

Front Parkinglot

As noted during your second visit on December 21st, the tires had been removed from the front parkinglot and moved internal to the structure, away from any potential impact to the elements.



Customer Yards

The production crew has begun housekeeping activities in the customer yards, and expects that all loose tires will be relocated indoors and staged for processing by January 04, 2013.

Indoor Tire Accumulation

Currently there exists a very large accumulation of rimmed/de-rimmed tires stored within the structure along the southeast wall. Pick-n-Pull is currently assessing the accumulation of tires and determining if any are salvageable, or if all must be loaded and properly disposed.

Future Condition

The potential for tires being left out and exposed to wet weather elements, will be addressed/controlled under two separate programs.

1. Degarbagging Process – Tires which can be removed, are removed from vehicles prior to being set in the yard.
2. Groundskeeping Procedure – This procedure sets in-place an expectation that the customer parkinglot is walked and cleared of any tires or debris on a daily bases.
3. Per our tire procedures, storage of tires on-site is limited to 500 or less.

C7. The Facility failed to submit annual reports as required by the NPDES permit

Annual Reporting

An annual operating report must be submitted by October 28th of each year to the appropriate Regional Office (notwithstanding any reporting requirements contained in the attached "Standard Conditions"). The report shall detail any unusual occurrences such as spills, tank failures or overflows, ruptured piping, fish kills, firefighting activities, or other upsets which resulted in any loss of product. Product includes, but is not limited to, fules, oils, other fluids, and paints. The report shall also detail any remedial work undertaken to recover product or clean up the site. The report must also indicate if nothing unusual has occurred.

C7 - Response:

Pick-n-Pull is unable to speak to activities that 'were' or 'were not' conducted prior to our taking ownership of the property, but rather only towards activities which will be conducted to ensure there are no re-occurrences.

Pick-n-Pull will enter into the locations environmental calendar, the report deadline of October 28th annually, for preparation and submittal of the locations Annual NPDES Report to the agency/department. Information to be contained in this report will be captured from the following: SPCC inspections (tank inspections, etc.), 'Hot Line' logs (spills, fires, property damage, etc.), prepared and submitted to the department by October 28th.

At Pick N Pull, we take storm water quality very seriously and we take your concerns about the site just as seriously. We feel that our BMP's and the planned improvements at our site, once fully in place, will deliver improvements in the quality of storm water leaving the site. We look forward to working with you on storm water issues and projects going forward.

Please do not hesitate to contact me with any questions you may have.

Sincerely,

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